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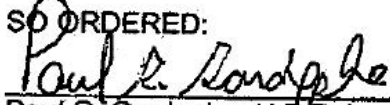
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MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

September 21, 2020

Dated: September 22, 2020

VIA ECF

The Honorable Paul G. Gardephe
United States District Judge for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: United States v. Kaleil Isaza Tuzman, S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We respectfully submit this letter on behalf of Kaleil Isaza Tuzman. First, he would like to convey his gratitude to the Court for allowing him to be with his family for his sister Intiya's wedding in Massachusetts in early July 2020.

Mr. Isaza Tuzman respectfully requests the Court's permission to visit family in the District of Massachusetts for the Jewish holiday of Yom Kippur from September 26–30, 2020.

If this Yom Kippur leave request is granted, Mr. Isaza Tuzman would stay with his father Luis-Orlando Isaza in Easthampton, MA, and with his sister Intiya Isaza-Figueroa in Charlestown, MA. Mr. Isaza Tuzman has stayed with each of these family members on a number of previous religious holiday visits since 2016. All other terms and conditions of home detention would remain in place during his leave, and Mr. Isaza Tuzman would remain at all times under the supervision of Pretrial Services.¹

This request has been communicated to Pretrial Services, which responded as follows: "As per our office policy, our office objects to out-of-district travel requests. This objection is general and not specific to Mr. Isaza Tuzman, who has remained compliant with supervision and has traveled without incident many times in the past. If this is approved, it will be entered into his schedule."

¹ We expect to submit a separate travel request on behalf of Mr. Isaza Tuzman for the subsequent Jewish holidays of Sukkot and Simchat Torah—which occur between October 2 and October 11, 2020—after a fixed schedule for Mr. Isaza Tuzman's family gatherings is determined.

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Mr. Isaza Tuzman has previously traveled to Massachusetts and other locations for religious and family events, with the Court's permission. *See, e.g.*, ECF Nos. 125, 441, 758, 952, 1033, 1089. In these cases and every other time Mr. Isaza Tuzman has traveled outside this District as permitted by the Court, he has left and returned without incident.

The government objects to this leave request, as it has all of Mr. Isaza Tuzman's prior such requests.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Avi Weitzman

Avi Weitzman

cc. All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via E-mail)